February 18, 2013
Via ECFS Filing

Ms. Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, DC 20554

RE: Spectrotel, Inc. d/b/a ONE Touch Communications d/b/a Surftone
CPNI CY2012
EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2012 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Spectrotel, Inc. d/b/a ONE Touch Communications d/b/a Surftone.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to sthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas
Sharon Thomas
Consultant to Spectrotel, Inc.

cc: Ross Artale (Email Only) - Spectrotel
Joe Mullin (Email Only) - Spectrotel
file: Spectrotel - FCC - Other
tms: FCx1301

Enclosures
ST/im

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification:	Covering calendar year 2012
Name of company(s) covered by this certification:	Spectrotel, Inc. d/b/a ONE Touch Communications d/b/a Surftone
Form 499 Filer ID:	**819208**
Name of signatory:	Ross Artale
Title of signatory:	Chief Financial Officer

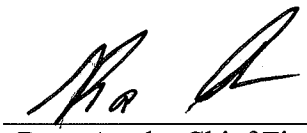
1. I, Ross Artale, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules; 47 C.F.R. § 64.2001 *et seq.*

2. Attached to this certification is an accompanying statement (Exhibit 1) explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

3. The company has not taken any actions against data brokers in 2012 The company is not aware of any attempts by pretexters or data brokers to access the CPNI of Spectrotel, Inc.'s customers and therefore has not had to take any actions against data brokers.

4. The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

5. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Ross Artale, Chief Financial Officer

2/14/13

Date

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A

Statement of CPNI Procedures and Compliance

Spectrotel, Inc.

d/b/a ONE Touch Communications d/b/a Surftone

Statement of CPNI Procedures and Compliance

I. Customer Proprietary Network Information ("CPNI")

CPNI is defined in Section 222(f) of the Communications Act as (A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier (except that CPNI does not include subscriber list information).

Generally, CPNI includes personal information regarding a consumer's use of his or her telecommunications services. CPNI encompasses information such as: (a) the telephone numbers called by a consumer; (b) the telephone numbers calling a customer; (c) the time, location and duration of a consumer's outbound and inbound phone calls, and (d) the telecommunications and information services purchased by a consumer.

Call detail information (also known as "call records") is a category of CPNI that is particularly sensitive from a privacy standpoint and that is sought by pretexters, hackers and other unauthorized entities for illegitimate purposes. Call detail includes any information that pertains to the transmission of a specific telephone call, including the number called (for outbound calls), the number from which the call was placed (for inbound calls), and the date, time, location and/or duration of the call (for all calls).

II. Use and Disclosure of CPNI is Restricted

Privacy concerns have led Congress and the FCC to impose restrictions upon use and disclosure of customer's CPNI, and upon the provision of access to it by individuals or entities inside and outside the Company.

The Company has designated a CPNI Compliance Officer who is responsible for: (1) communicating with the Company's attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions: (2) supervising the training of Company employees and agents who use or have access to CPNI; (3) supervising the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; (4) maintaining records regarding the use of CPNI in marketing campaigns; and (5) receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

Company employees and agents that may deal with CPNI have been informed that there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the Company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

Before an agent, independent contractor or joint venture partner may receive or be allowed to access or use the Company's CPNI, the agent's independent contractor's or joint venture partner's agreement with the Company must contain provisions (or the Company and the agent, independent contractor or joint venture partner must enter into an additional confidentiality agreement which provides) that: (a) the agent, independent contractor or joint venture partner may use CPNI only for the purpose for which the CPNI has been provided; (b) the agent, independent contractor or joint venture partner may not disclose or distribute the CPNI to, or allow access to the CPNI by, any other party (unless the agent, independent contractor or joint venture partner is expressly and specifically required to do so by a court order); and (c) the agent, independent contractor or joint venture partner must implement appropriate and specific safeguards acceptable to the Company to ensure the confidentiality of the Company's CPNI.

III. Protection of CPNI

1. The Company may, after receiving an appropriate written request from a customer, disclose or provide the customer's CPNI to the customer by sending it to the customer's address of record. Any and all such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer. The Company will disclose CPNI upon affirmative written request by the customer to any person designated by the customer, but only after the Company calls the customer's telephone number of record and/or sends a notification to the customer's address of record to verify the accuracy of this request.

2. The Company will provide a customer's phone records or other CPNI to a law enforcement agency in accordance with applicable legal requirements.

3. Company employees will authenticate all telephone requests for CPNI in the same manner whether or not the CPNI consists of call detail information. That is, Company employees must: (a) send the requested information to the customer's postal or electronic address of record; or (b) call the customer back at the customer's telephone number of record with the requested information.

4. If a customer subscribes to multiple services offered by the Company and an affiliate, the Company is permitted to share the customer's CPNI regarding such services with its affiliate. If a customer does not subscribe to any telecommunications or non-telecommunications services offered by an affiliate, the Company is not permitted to share the customer's CPNI with the affiliate without the customer's consent pursuant to the appropriate notice and approval procedures set forth in Sections 64.2007, 64.2008 and 64.2009 of the FCC's rules.

5. When an existing customer calls the Company to inquire about or order new, additional or modified services (in-bound marketing), the Company may use the customer's CPNI other than call detail CPNI to assist the customer for the duration of the customer's call if the Company provides the customer with the oral notice required by Sections 64.2008(c) and 64.2008(f) of the FCC's rules, and after the Company authenticates the customer.

6. The company does not use, disclose or permit access to CPNI in connection with Company-initiated marketing of services to which a customer does not already subscribe from the Company (out-bound marketing), except as permitted pursuant to Section 64.2005 of the FCC's rules.

7. The Company's employees and billing agents may use CPNI to initiate, render, bill and collect for telecommunications services. The Company may obtain information from new or existing customers that may constitute CPNI as part of applications or requests for new, additional or modified services, and its employees and agents may use such customer information (without further customer approval) to initiate and provide the services. The Company's employees and billing agents may use customer service and calling records (without customer approval): (a) to bill customers for services rendered to them; (b) to investigate and resolve disputes with customers regarding their bills; and (c) to pursue legal, arbitration, or other processes to collect late or unpaid bills from customers.

8. The Company's employees and agents may use CPNI without customer approval to protect the Company's rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived. Any such access, use, disclosure or distribution of CPNI pursuant to this section must be expressly approved in writing by the Company's CPNI Compliance Officer.

9. The Company's employees, agents, independent contractors and joint venture partners may not use CPNI to identify or track customers who have made calls to, or received calls from, competing carriers. Nor may the Company's employees, agents, independent contractors or joint venture partners use or disclose CPNI for personal reasons or profit.

10. The Company may permit it's customers to establish online accounts, but must require an appropriate password to be furnished by the customer before he or she can access any CPNI in his or her online account.

11. The Company will retain all customer passwords and secret question-answer combinations in secure, encrypted files. Customer may obtain a replacement password by either (a) providing appropriate responses to his or her secret question(s); or (b) calling the Company's business office to have their online account deleted, after providing appropriate authentication information. In instances where the customer requests to delete their online account, they will then be required to electronically re-establish a new online account by selecting a new password and secret question(s).

12. In instances where the Company is unable to authenticate the source of the request, the Company will notify customer immediately of certain changes or requests for changes in their accounts that may affect privacy or security matters;

    a. The types of changes that require immediate notification include: (a) change or request for change of the name of the customer of record; (b) change or request for change of the customer's address of record; and (c) change or request for change of any significant element of the customer's online account.

    b. The notice may be provided by (a) a Company call or voicemail to the customer's telephone number of record; or (b) a written notice mailed to the customer's address of record (to the customer's prior address of record if the change includes a change in the customer's address of record).

    c. The notice must identify only the general type of change and must not reveal the changed information.

    d. The Company employee or agent sending the notice must prepare and furnish to the CPNI Compliance Officer a memorandum containing: (a) the name, address of record, and telephone number of record of the customer notified; (b) a copy or the exact wording of the verbal or voicemail message or written notice comprising the notice; and (c) the date and time that the notice was sent.

13. The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that the affected customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Specifically, as soon as practicable, and in no case later than seven business days upon learning of a breach, the company will notify the U.S. Secret Service and the FBI by electronic means, as required by FCC regulations. The company will not notify customers or disclose a breach to the public until seven full business days have passed after notification to the U.S. Secret Service and the FBI, unless it believes there is an extraordinarily urgent need to notify customers before seven days in order to avoid immediate and irreparable harm. In that instance, it will only notify such customers *after* consultation with the relevant investigating agency and will cooperate with the agency's request to minimize any adverse effects of the customer notification. If the Company receives no response from law enforcement after the seventh full business day, it will promptly proceed to inform the customers whose CPNI was disclosed of the breach. The company will delay notification to customers or the public if requested to do so by the U.S. Secret Service or FBI. Notifications to law enforcement and customers are handled by a designated supervisor level employee responsible for managing the company's CPNI compliance.

14. The Company takes reasonable measures to discover and protect against activity that is indicative of pretexting including requiring Company employees, agents, independent contractors and joint venture partners to notify the CPNI Compliance Officer immediately by voice, voicemail or email of: (a) any suspicious or unusual call requesting a customer's call detail information or other CPNI; (b) any complaint by a customer of unauthorized or inappropriate use or disclosure of his or her CPNI. The CPNI Compliance Officer will request further information in writing, and investigate or supervise the investigation of, any incident or group of incidents that reasonably appear to entail pretexting.

    Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI. If the Company suspects that a pre-texter may be attempting to gain access to CPNI, it will immediately ask the requester to provide information that only the customer would be able to provide and would further investigate suspected pre-texting activity.

IV. CPNI Compliance Officer

In addition to the specific matters required to be reviewed and approved by the Company's CPNI Compliance Officer, employees and agents, independent contractors and joint venture partners are strongly encouraged to bring any and all other questions, issues or concerns regarding the use, disclosure or access to CPNI to the attention of the Company's CPNI Compliance Officer for appropriate investigation, review and guidance.

V. Disciplinary Procedures

The Company has informed its employees and agents, independent contractors and joint venture partners that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by Company employees or agents of such CPNI requirements will lead to disciplinary action; including remedial training, verbal probationary warning, written probationary warning and/or termination, depending upon the circumstances, severity, and/or quantity of the violation(s), whether appropriate guidance was sought or received from the CPNI Compliance Officer, and the extent to which the violation was or was not deliberate or malicious.

Violation by Company independent contractors or joint venture partners of such CPNI requirements will lead to prompt disciplinary action, up to and including remedial training and termination of the contract.